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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**NEVADA GOLD MINES LLC**, a Delaware  
Corporation,

Plaintiff,

vs.

**IMATECH SYSTEMS CYPRUS PTY LTD**  
**dba ARMORPIPE™ TECHNOLOGIES**, a  
foreign Corporation; **INTERNATIONAL**  
**MATERIALS & TECHNOLOGY PTY**  
**LIMITED dba IMATECH**, a foreign  
Corporation; and **DOES 1 to 10**, inclusive,

Defendants.

Case No. 3:18-cv-00575-HDM-WGC

**STIPULATION TO FILE FIRST AMENDED  
COMPLAINT**

Plaintiff, Nevada Gold Mines, LLC (“NGM”) a Delaware limited liability company and  
Defendants Imatech Systems Cyprus PTY Ltd dba Armorpipe™ Technologies (“Imatech  
Cyprus”) and International Materials & Technology PTY Limited dba Imatech (“IM&T”),  
without waiver of any defenses hereby stipulate as follows:

1. NGM filed its original complaint on December 4, 2018.
2. NGM now seeks to file a First Amended Complaint that includes claims against  
additional entities Imatech Manufacturing Centre Pty Ltd. and Armorpipe Pty Ltd., as well as  
additional factual allegations to support its claims.
3. Without waiving any jurisdictional arguments or other defenses and pursuant to

FRCP 15(a)(2), Imatech Cyprus and IM&T consent to NGM filings its First Amended Complaint, a copy of which is attached hereto as **Exhibit 1**.

4. In light of prior rulings in this matter in connection with service of process issues, Counsel for Imatech Cyprus and IM&T recognize that it is highly likely that the Court would ultimately issue an Order for alternative service by e-mail if service through the Hague Convention proved difficult. With the express understanding that all defenses other than service of process are reserved, service of the First Amended Complaint with respect to all Defendants will be effectuated by e-mail to [jwhitmire@santoronevada.com](mailto:jwhitmire@santoronevada.com).

RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of November, 2019.

McDONALD CARANO LLP

SANTORO WHITMIRE

/s/ Sarah Ferguson

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*Attorneys for Defendants Imatech Systems*

*Cyprus PTY Ltd dba Armormipe™*

*Technologies and International Materials &*

*Technology PTY Limited dba Imatech*

IT IS SO ORDERED.

*Walter G. Cobb*

UNITED STATES MAGISTRATE JUDGE

DATED: November 7, 2019.